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BEFORE THE ARIZONA CORPORATION COMMISSION

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DOCKET NO. U-0000-97-238

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ADDITIONS TO MAY 27, 1997
PROCEDURAL ORDER

IN THE MATTER OF U. S WEST)
COMMUNICATIONS, INC.'S)
COMPLIANCE WITH § 271 OF THE)
TELECOMMUNICATIONS ACT OF)
1996)

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On May 27, 1997, the Arizona Corporation Commission ("Commission") issued a procedural order (the "Order") outlining the procedure to be used for collecting information bearing on an application filed by U S WEST Communications, Inc. ("U S WEST") under section 271 of the Telecommunications Act of 1996. That order permitted interested parties to suggest, within 21 days, additional items or questions to be included in Attachments A and B of the Order. This filing contains additions proposed by AT&T.

I. ATTACHMENT B

Attachments A and B of the Order contain questions taken from the August 1996 Department of Justice ("DOJ") document titled "Issues and Information to Consider In Evaluating BOC Section 271 Application For In-Region InterLATA Entry." In February of this year, DOJ distributed to members of the public a supplement to that 1996 memorandum which describes additional categories of information states should gather in evaluating a section 271 application. That supplemental memorandum is attached to this filing. AT&T requests that at least the following questions from the DOJ supplemental memorandum be added to Attachment B:

Capacity for providing resold services and network elements [DOJ memo, question 8].

- a) What volumes of orders for checklist items has U S WEST been fulfilling and is U S WEST capable of handling current levels of demand for services by competitors in a reasonable and timely manner?

Arizona Corporation Commission
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- b) For example, how many orders for resold services and unbundled loops has U S WEST been processing in a day? How does the volume of orders from competitors that U S WEST is processing in a day compare to the volumes of orders that it can process for its own retail customers in a day?
- c) How many orders for service does U S WEST complete for its own retail customers in a specified time period and how does this compare to the numbers of orders for checklist items from competitors that U S WEST can complete within the same time period.

Future capacity for providing resold services and network elements [DOJ memo, question 9].

- a) Is U S WEST capable, or will U S WEST be capable, of meeting future forecasted demands for checklist items and how does U S WEST propose to meet such demands? For example, if competitors inform U S WEST that they expect to increase their demand for certain checklist items at a scheduled time period, will U S WEST be capable of processing and completing such increased orders by that date and in a timely manner?
- b) Does U S WEST have plans in place by which it could increase the capacity of the mechanisms it has set up to handle competitor demands for checklist items and what are those plans, do they include electronic and manual mechanisms?
- c) Does U S WEST have plans in place by which it could increase the capacity of the mechanisms it has set up to handle competitor demands for checklist items and what are those plans, do they include electronic and manual mechanisms?


II. HEARING ON U S WEST SECTION 271 APPLICATION

Ninety days before U S WEST files its application with the FCC, it must file all information responsive to Attachments A and B with the Commission. Order ¶6, subpart 4. Interested parties have 30 business days to file comments on U S WEST's application with the Commission. Id. subpart 4. U S WEST has 15 business days to respond to the comments of interested parties. Id. AT&T understands that the briefing schedule outlined in the Order applies equally to the early filings by U S WEST relating to less than all checklist items, and the final all-encompassing filing which will address all 14 checklist items. This briefing process will require approximately 64-66 calendar days (depending upon which holidays follow the U S WEST filing). AT&T submits that the Commission will be aided by -

1 - and fairness to interested parties necessitates -- a hearing on the U S WEST section 271
2 application. AT&T proposes that the hearing be held no sooner than ten business days
3 following U S WEST's filing of responsive comments. During this hearing, Commission
4 representatives and interested parties will be able to question U S WEST concerning
5 information submitted in the docket and U S WEST will be able to question interested parties
6 regarding comments filed in the docket.

7 DATED this 17th day of June, 1997.

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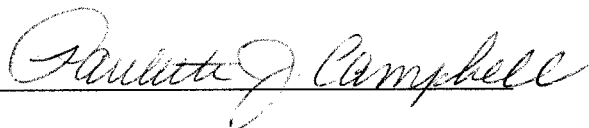
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FURTHER ISSUES AND INFORMATION TO CONSIDER IN EVALUATING BOC SECTION 271 APPLICATIONS FOR IN-REGION INTERLATA ENTRY

In August of 1996 the Department issued a document (DOJ Working Draft No. 1), describing certain categories of information that the Department believes would be useful for states to obtain in a BOC 271 compliance proceeding. This document supplements the suggested list of questions in our earlier Working Draft by focusing on the problems associated with ordering, provisioning, and maintaining BOC elements and services and developing appropriate performance standards.

(1) Which, if any, of the fourteen checklist items is the BOC presently commercially provisioning to competitors with whom it has entered into interconnection agreements that have been approved by a State PUC under section 252 of the Telecommunications Act?

(2) Which, if any, of the fourteen checklist items is the BOC capable of commercially provisioning even if it is not actually furnishing them to any competitors? How has the BOC demonstrated this capability?

(3) Is the BOC provisioning checklist items, or is it capable of provisioning checklist items, in conformance with the requirements in the FCC's August 8th Order?

(4) What are the mechanisms the BOC has set up to provision checklist items to competitors? Such mechanisms could include electronic interfaces as well as manual procedures implemented by employees. For example, to respond to a competitor's request for unbundled loops, what steps does the BOC follow and what systems does it use? Does the BOC employ electronic interfaces to respond to requests for unbundled loops and how does it physically cut over the loops to competitors? What steps does the BOC follow to provide competitors with access to poles, ducts and rights of way?

(5) Has the BOC set up mechanisms to provision checklist items in all areas of a state, including areas where it is not currently provisioning checklist items to competitors? How do the mechanisms that the BOC has set up in areas of a state where it is provisioning checklist items compare to the mechanisms it has set up in areas of a state where it is not currently provisioning them? Are there any differences between areas of a state where the BOC is provisioning checklist items and areas of a state where it is not such that, in these latter areas, the BOC would need to set up different or additional mechanisms to provision checklist items?

(6) In connection with each checklist item that a BOC is commercially provisioning to competitors: (a) how many of such items has the BOC provisioned; (b) what types of each item is the BOC provisioning; (c) to whom is the BOC provisioning these items; and (d) are any competitors using these items to provision service to their

own retail customers? For example, if a BOC is commercially provisioning unbundled loops to competitors, what types of loops is the BOC provisioning, how many of such loops has the BOC already provisioned, to whom has the BOC provisioned these loops, and are the competitors currently using these loops to provision service to their own customers?

(7) What are the time periods within which a BOC is meeting current competitor demands for checklist items and how does that timing compare with either the timing under which the BOC provisions such items to itself or the timing under which it provisions retail services to its own retail customers? For example, how does a BOC determine which competitor requests to respond to first? Does it do so on a first come, first serve basis, or under some other system? Once a competitor has submitted a request for an unbundled loop, for example, how quickly does the BOC implement the request and how does this compare to the time within which the BOC can turn up service for its own retail customers? How does the time within which a BOC provides service to its own retail customers compare to the time within which it completes an order from a competitor for resold services?

(8) What volumes of orders for checklist items has the BOC been fulfilling and is the BOC capable of handling current levels of demand for services by competitors in a reasonable and timely manner? For example, how many orders for resold services and unbundled loops has the BOC been processing in a day? How does the volume of orders from competitors that a BOC is processing in a day compare to the volumes of orders that it can process for its own retail customers in a day? How many orders for service does a BOC complete for its own retail customers in a specified time period and how does this compare to the numbers of orders for checklist items from competitors that a BOC can complete within the same time period?

(9) Is the BOC capable, or will the BOC be capable, of meeting future forecasted demands for checklist items and how has the BOC proposed to meet such demands? For example, if competitors inform a BOC that they expect to increase their demand for certain checklist items at a scheduled time period, will the BOC be capable of processing and completing such increased orders by that date and in a timely manner? Does the BOC have plans in place by which it could increase the capacity of the mechanisms it has set up to handle competitor demands for checklist items and what are those plans, do they include electronic and manual mechanisms?

(10) How does the quality and reliability of checklist items that the BOC is provisioning to competitors compare to the quality and reliability of such items when the BOC either provisions them to itself or uses them to provide service to the BOC's own retail customers?

(11) Are the operations support systems (OSS) the BOC has set up for pre-

ordering, ordering, provisioning, maintenance and repairs, and billing working on a commercial basis? Do these systems adhere to any current or expected national standards? What tasks are these systems performing? Who are the competitors that have used them and who are the competitors that are currently using them? How long have these competitors been using these systems, which checklist items are they being used to take orders for, and are there any checklist items they cannot handle? What volumes of orders and other electronic transactions for each checklist item are the OSS systems currently handling, what are the time periods under which these systems are responding to such orders and transactions, and how reliable are these systems? How does the quality of the OSS systems which the BOC is using for competitors compare in practice to the quality of the comparable systems which the BOC currently uses for its own retail operations? Do the BOC's OSS systems have the capacity to handle future forecasted demands? If not, can the capacity be increased to accommodate future increased demand in a timely manner and has the BOC submitted plans demonstrating how it can increase the capacity of its systems to meet such demand?

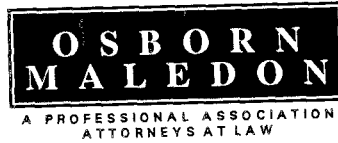
(12) Are there any performance standards the BOC must meet regarding the quality, reliability, and timeliness of provisioning checklist items? How were these performance standards determined and how do they compare to the performance standards the BOC meets when it provisions checklist items to itself or services to its own end use customers? Are there any mechanisms to enforce these standards and what are these mechanisms? Are there any reporting requirements that a BOC must comply with that can be used to judge whether the BOC is meeting these performance standards?

(13) Have competitors set forth any significant complaints about any of the mechanisms that the BOC has instituted to order, provision or maintain checklist elements and services, or to ensure adequate levels of performance quality on an ongoing basis with competitive parity between the BOC and its competitors?

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